

July 13, 2021

via ECFS

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

RE: NOTICE OF EX PARTE

WC Docket No. 18-89 – Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs

Dear Ms. Dortch:

On July 9, 2021, Carri Bennet, General Counsel, Rural Wireless Association, Inc. ("RWA"), Lisa Hanlon, CEO of Teltech Group, Mike Meagher, President of Teltech Group and Danny Wade, COO of Teltech Group (together, "RWA representatives") met with Callie Coker, Brian Cruikshank, Justin Faulb, Christopher Koves and William Layton of the Federal Communications Commission's ("FCC") Wireless Competition Bureau to provide information concerning Teltech Group's process for the removal and destruction of unsecure network equipment. In the meeting Teltech Group reviewed the attached presentation with the FCC attendees and demonstrated through this video clip how its software tool, TAM 2.0, could assist in tracking the removal and destruction of unsecure Huawei and ZTE equipment from U.S. networks. Teltech Group also provided details about its removal and destruction process that can be tracked by location, serial numbers and a multitude of granular levels.

Teltech explained that it has been in the asset management business for over 20 years and developed its TAM 2.0 software specifically to manage and visualize an end-to-end returns process for its customers and joined RWA so that it could assist rural carriers with the FCC's Reimbursement Program.

Teltech noted that it took approximately 24 months for the removal and destruction of about 4,200 Huawei WiMAX sites Sprint acquired when it purchased Clearwire once the equipment was decommissioned. However, it was noted that this timeline is heavily dependent on the individual carrier and its ability to operate on a standardized process and toolset, which Teltech provided examples of to insure timely completion.

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RWA thanks the FCC for its efforts in creating a Reimbursement Program and looks forward to providing additional input on the removal and destruction process.

Respectfully submitted,

/s/ Carri Bennet

Carri Bennet, General Counsel 5185 MacArthur Blvd., NW, Suite 729 Washington, DC 20016 (202) 857-4519 legal@ruralwireless.org

Attachment

cc: Callie Coker
Brian Cruikshank
Justin Faulb
Christopher Koves
William Layton



FCC Reimbursement Program

July 2021

Corporate Information

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Contact

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Teltech Overview



Regional Offices

- Dallas, TX
 - Corporate HQ Frisco
 - DFW Operations Center Flower Mound
- Grand Junction, CO
 - Alternative Solutions
 - Operations Center
- Raleigh, NC
 - Operations & Testing Center



Diversity Certifications

- WBENC (Natl Women's Business Enterprise Certification)
- WOSB (Woman Owned Small Business)
- NABA (Native American Business Association)
- NMSDC (Natl Minority Supplier Development Council Certification)
- SBE (Small Business Enterprise DFW Minority Council Certification)
- HUB (Texas Historically Underutilized Business Certification)
- CPUC (CA Women/Minority Business Enterprise (WMBE)



Key Services Offerings

- Forward & Reverse Logistics / Warehouse / Transportation
- Staffing and Support Services
- Technology Asset Lifecycle Management
- Value Added Supply Chain Management
- Emerging Technology Solutions
 - Drone Solutions
 - Solar Power Solutions
 - IoT Tracking Devices/Electricity Devices
 - Private Networks/Smart Warehousing



Industry Certifications

- ISO 14001 Environmental Management System Certification
- ISO 45001 Occupational Health & Safety Management System Certification
- ISO 9001/TL 9000 R6.0/R5.5 ICT Quality Management System Certification

Teltech Group Leadership



Lisa Hanlon - Chairman and Chief Executive Officer

Lisa Hanlon is the Co-Founder, Executive Chairman and CEO of Teltech Communications. In this role, she is responsible for business development and strategy and executing the strategic goals and initiatives of the company. Prior to co-founding Teltech in 1999, Lisa began her telecom career overseeing OEM and strategic partner relationships in the secondary market industry. Lisa currently serves on the Board of Directors of the DFW Minority Business Council and is the co-founder of Women for Wounded Warriors, a non-profit organization that provides resources, support, and employment opportunities for spouses, family members and caregivers for our American Veterans.

Lisa studied pre-med at the University of North Carolina-Greensboro and the University of Colorado-Boulder and is a graduate of the Tuck-WBENC Executive Education Program.



Mike Meagher- President

Mike Meagher is the President of Teltech Group, joining the company in 2019. In this role, Mike is responsible for establishing the short and long-term goals, plans and strategies to achieve the profitable growth objectives of Teltech Group. Mike brings over 20 years of leadership and experience in the telecommunications industry to Teltech, holding executive positions in operations, sales and finance for Ericsson and Nortel Networks. In his most recent role, Mike was responsible to develop the strategy and design the infrastructure for Ericsson's Factory of the Future, leveraging 5G technology and Industrial IoT to onshore 5G radio production inside the United States. Prior to that, Mike was Vice President, Supply & Logistics for Ericsson Group Supply Americas, where he had endto-end supply and logistics responsibility for an \$8B+ Business across North and South America. Mike received his MBA with a Finance concentration from Southern Methodist University and his BBA with a Finance concentration from the University of Texas at Arlington.



Danny Wade - Chief Operating Officer

Danny Wade brings 35 years of telecommunications leadership and experience to the Teltech Group. Wade joined the company in 2010 and in his current position, he is responsible for the overall execution and performance of Teltech's operational activities. Prior to joining Teltech, Wade served as an industry consultant in the areas of Supply Chain, Organization Development, Strategy, and Business Development. From early 2007 through mid-2010, Wade was President and Chief Operating Officer for Goodman Networks and played a major role in Goodman's growth and success from a \$100M company to a \$500M company during that period. Previously, Wade was Group Vice-President, Operations, Services & Duality for Alcatel North America. Wade is a senior member of the University of Oklahoma Industrial Engineering Advisory Board. He holds a B.S. in Industrial Engineering from the University of Oklahoma.



Distribution Centers & Regional Warehouses

Teltech Group DC Locations



Project Warehouses/Final Mile Footprint





Tier 1 Carrier Huawei Decommissioning Overview

NSA

To allow acquisition of Tier 1
Carrier, the U.S. Government
(USG) required Carrier and
acquiring party to sign a
confidential National Security
Agreement (NSA) with the
Committee on Foreign
Investment in the United States
(CFIUS) Agencies, including U.S.
Departments of Justice,
Homeland Security, and Defense

3rd Party Auditor

The NSA required a third-party auditor to conduct an annual audit to assess Carrier's compliance with the NSA

Remove Objectionable Equipment

The NSA required the removal of 'Objectionable Equipment' (e.g., Huawei and ADC LoopStar) from Carrier's network

Tier 1 Carrier Huawei Decommissioning Overview

4,200 Huawei WiMax sites decommissioned from Carrier's network

Sent to Teltech to capture serial numbers and for asset destruction

3rd party auditor validated removed 'Objectionable Equipment,' comparing serial numbers against original site visit records



Huawei Destroyed Assets

All asset destruction activities had to be validated, tracked and reported at the serial number level, with documentation of destruction





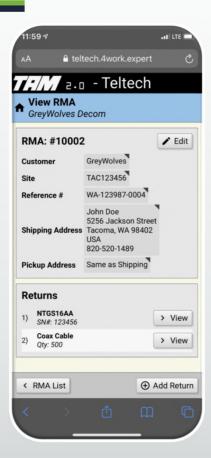






Teltech's Cloud-Based Asset Tracking Solution

- Teltech developed and managed an asset tracking tool called TAM (Teltech Asset Management) for client's reverse logistics management, tracking and reporting.
- TAM is accessible from any browser format and is also app-based and can be automatically sized as desktop vs tablet vs mobile
- TAM was utilized for all Huawei decommissioned assets which allowed the Carrier and Teltech to achieve compliance with government auditor requirements
 - All Decommissioned Assets were tracked from field to a Teltech warehouse location in Grand Junction, CO
 - Tracking was performed at the Serial Number level for all capitalized assets
 - Teltech provided reports to Carrier and 3rd-Party Auditor to validate decommissioned assets by site at serial number level
- TAM was instrumental in providing the serial number tracking and details to 3rd-Party Auditor and U.S. Government.





■ Next Generation Asset Management -TAM 2.0

In 2020, Teltech invested in the development of a Best-in-Class Asset Management Tool, **TAM 2.0**, to provide clients tracking of all field-related forward and reverse logistics activities

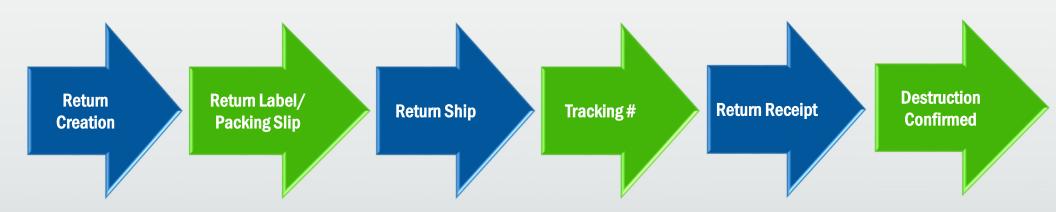


- Remote warehouse inventory visibility and tracking for Forward Logistics projects
- Reverse Logistics projects: RMA and Advanced Replacements; Decommissioning,
 Harvesting, Upgrades, Failures, Overage/Excess, etc.
- Here is a link for a YouTube video on the application <u>Teltech TAM 2.0 YouTube</u>



■ Return Management

- Once a return is created, expected assets are tracked, recorded, and mapped against warehouse receipts to ensure all expected assets are accounted for.
- TAM 2.0 generates automated email notifications to keep customers updated on all return transactions along the reverse logistics process.

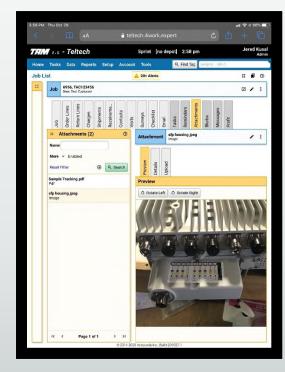




■ Return Management

Detailed reporting ensures customers have visibility to all aspects of the return including:

- Job details (addresses, site information, return status, etc.)
- Tracking/carrier information
- Item details (part numbers, serial numbers, SKU numbers, etc.)
- Transactional details (time/date stamps, user stamps etc.)
- Expected vs Actual discrepancy details



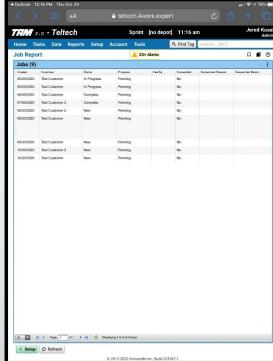




Return Management

- TAM 2.0 can store all documentation including:
 - Shipping documentation
 - Photos of destruction
 - Certificate of destruction documentation
 - Saved email threads
- All documentation is accessible to the customer via customer portal







Additional Features Available

- TAM 2.0 is equipped with ordering options to ship and supply equipment back to the field as advanced replacements where necessary (break/fix).
- Orders are mapped against corresponding shipments to ensure timely and accurate responses
- TAM 2.0 generates automated order status updates via email

- Client specific requirements are mapped into TAM 2.0's central repository and turned into scalable and repeatable processes
- This allows Teltech to rapidly adapt to increasing and decreasing volume





Additional Features Available

- TAM 2.0's flexible and configurable structure enables use across multiple projects' Scope-of-Work within all Logistics activities
- SLA Tracking is optimized with TAM 2.0:
 - Customer timeline requirements are mapped into TAM
 2.0's central repository
 - Transactions are time and user stamped
 - Dock to disposal durations are recorded and measured against customer requirements
 - Order durations are recorded and measured against customer requirements







TAM 2.0 – Optimized Solution for FCC Reimbursement Program

- Teltech has a strong history of managing the decommissioned assets of Chinese OEMs and validating their return and destruction for U.S. Carriers
- Teltech's TAM 2.0 Asset Tracking system can be optimized to capture all details around Chinese assets to be decommissioned from U.S. cell sites

Projected/Expected Decommissioned Assets can be populated in TAM 2.0 establish a baseline of returns by cell site Actual received assets can be compared to expected items per cell sites – exceptions will be highlighted for reconciliation

Field Techs or General Contractors can create the return process for decommissioned assets via smart phones, tablets or laptops

All assets can be tracked real-time with summary and detail reporting readily provided and customized





Teltech Group is extremely well positioned to provide end-to-end Asset Management of all Decommissioned Chinese Assets that must be removed from U.S. based Carriers and we have Best-in-Class processes and systems to provide outstanding results.

THANK YOU



Reverse Logistics

Teltech Historical Use Cases



Tier 1 NV Reverse Logistics & Asset Mgmt.

Teltech supported a Tier 1 Carrier's Network Vision Project as the Reverse Logistics and Asset Management Partner. Objective was to maximize the overall asset management of its legacy equipment, including reuse of legacy equipment to reduce CapEx spend. Teltech created a solution that provided a set of end-to-end services that met their needs.

End of Life

- 400 cabinets de-manufactured per week
- 100,000 lbs. of electronics and wire demanufactured per week
- 42M lbs. of metal recycled
- 23M lbs. of batteries
- 7M lbs. of electronics recycled (e-Waste)

Asset Management and Recovery

 42k return orders processed through distribution center network



Logistics

- Over 500k sq. ft. of Grand Junction, CO warehouse space
- 1.1M serialized assets received and tracked
- · National transportation carrier solution
- Success of reverse logistics solution resulted in forward logistics relationship with Carrier

Fulfillment

- 6,000 equipment orders fulfilled
- 2,500 kitting orders processed

Tier 1 Carrier saved over \$550M in network deployment and equipment CapEx costs via refurbishment for reuse of invested assets. Teltech's Reuse and Recycle Zero Landfill solution resulted in zero landfill and supported the Tier 1 Carrier's EPA Award



Tier 1 OEM Reverse Logistics Project

A Tier 1 OEM was selected to upgrade a Tier 1 Carrier's wireless network and was looking for a partner to support the reverse logistics for decommissioned and de-installed equipment per the carrier. Teltech created a solution that provides a set of end-to-end services to meet the needs of both the OEM and the Carrier.

End of Life

- Transparency on all phases of the operations with traceability to the serial number level through certificates of destruction
- Reduction in Carbon Footprint & Zero Landfill

Asset Management and Recovery

- Segregation of e-scrap for higher recovery
- Strong partnerships with established e-waste, battery and metal refinery partners
- Supported reuse process for Carrier through refurbishment of legacy assets



Logistics

- 38 Nationwide local storage and staging facilities for de-installed assets
- Custom asset tracking application TAM
- Outgoing shipments facilitated by nationwide transportation network

Program / Project Management

- Dedicated team to manage 38 nationwide facilities and associated logistics
- Managed disposition and transportation of assets which allowed OEM to meet Carrier's requirements

Teltech's solution provided Carrier/OEM with Zero Landfill results and >25 million pounds in landfill reduction through the use of Teltech's Reuse, Resale, Repurpose & Recycle processes for 15,000 cell sites.



Teltech's Solution for Tier 1 Carrier WiMax Decom

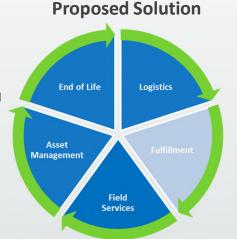
Teltech provided end-to-end program management by offering an experienced dedicated team to manage all in-market logistics, warehousing needs nationwide. Teltech Asset Management and End-of-Life capabilities allowed Tier 1 Carrier to meet all DOJ audited requirements on Huawei assets.

End of Life

- Transparency on all phases of the operations with traceability to the serial number level through certificates of destruction
- Reduction in Carbon Footprint & Zero Landfill

Asset Management and Recovery

- Huawei Assets Managed to meet DOJ requirements – Certificates of Destruction
- Segregation of e-scrap for higher recovery
- Strong partnerships with established ewaste, battery and metal refinery partners



Logistics

- Nationwide local storage and staging facilities for de-installed assets
- · Custom asset tracking application TAM
- Outgoing shipments facilitated by nationwide transportation network

Field Services

- Provide Decommissioning Crews for Central Region
- Utilize strategic relationship with W4W

Teltech's Program Management and proven success for decommissioning, asset management and recovery coupled with our industry specific end of life expertise in telecommunications ensured that this Tier 1 Carrier's decom was optimized for safety, quality, schedule and cost while reducing all environmental impacts and further enhancing this Carrier's brand as a leader in Sustainability and CSR.

